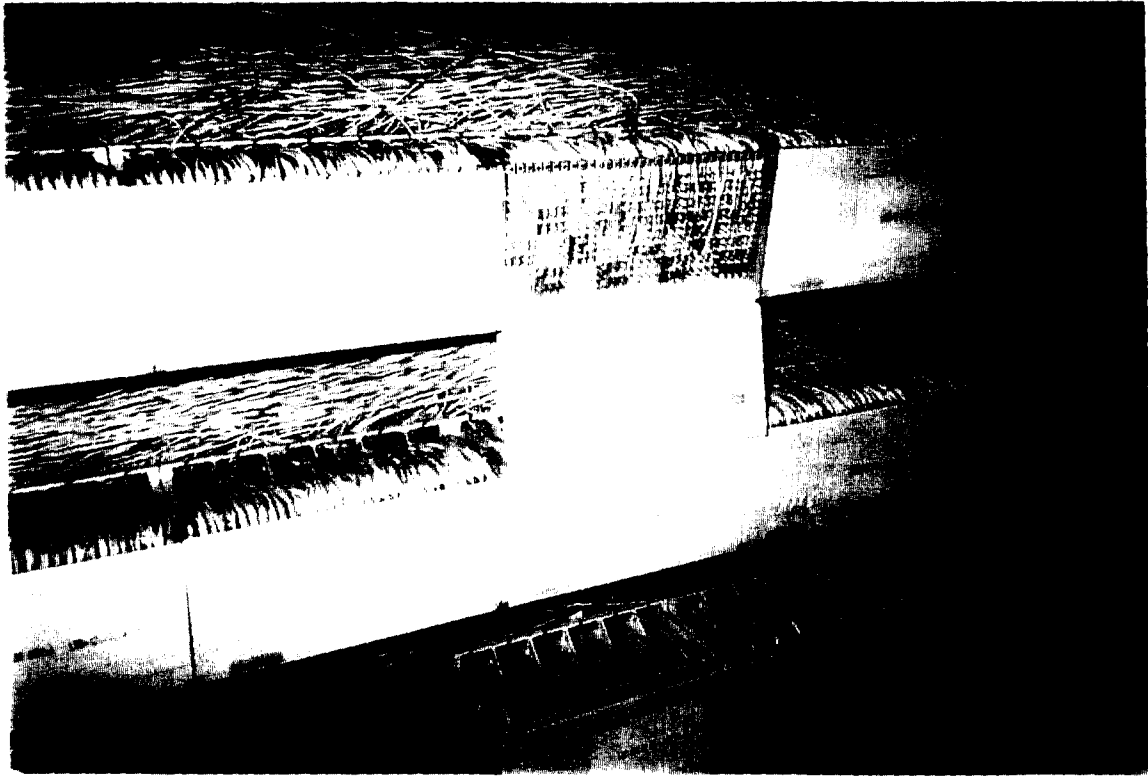


ATTACHMENT 7

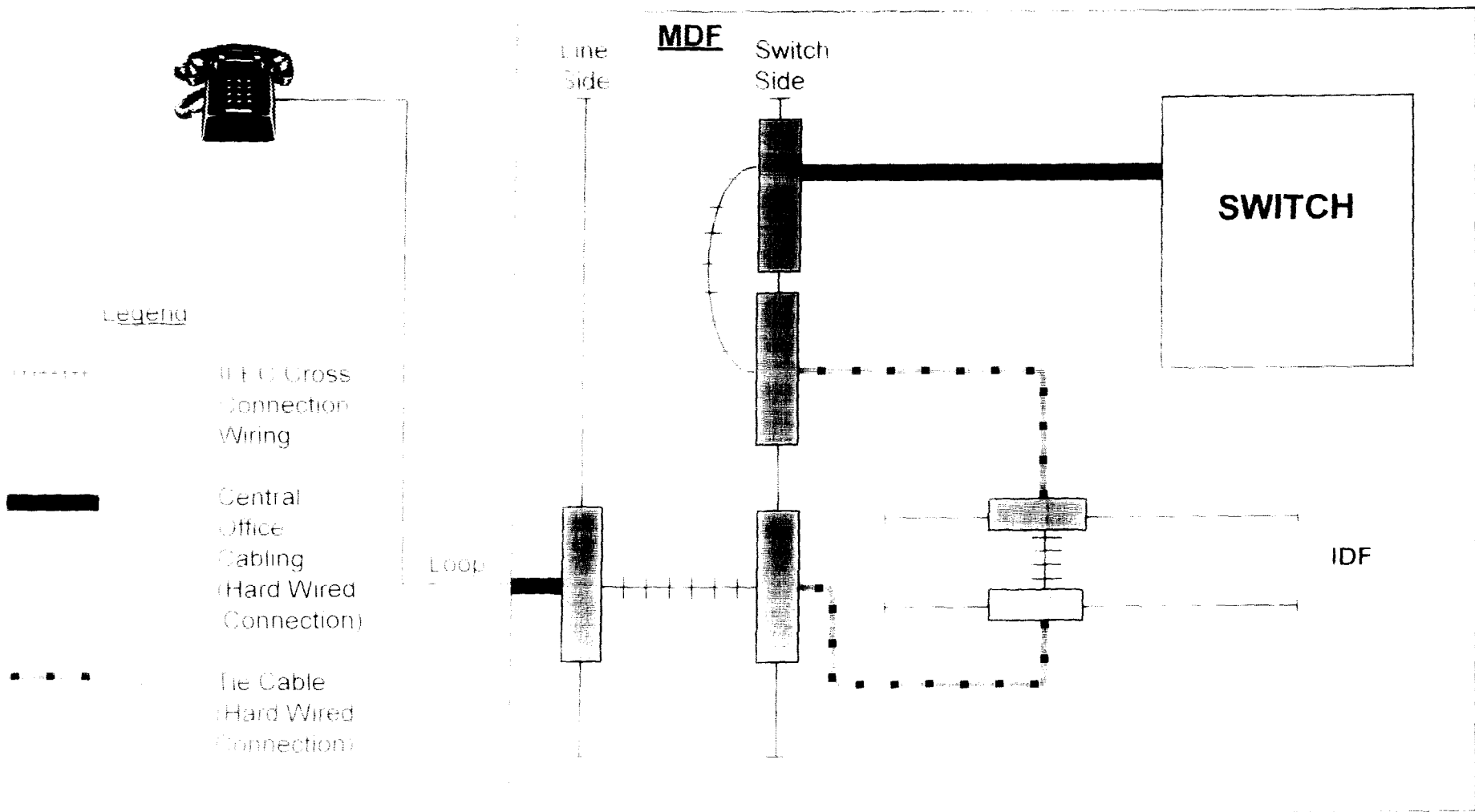


ATTACHMENT 8



ATTACHMENT 9

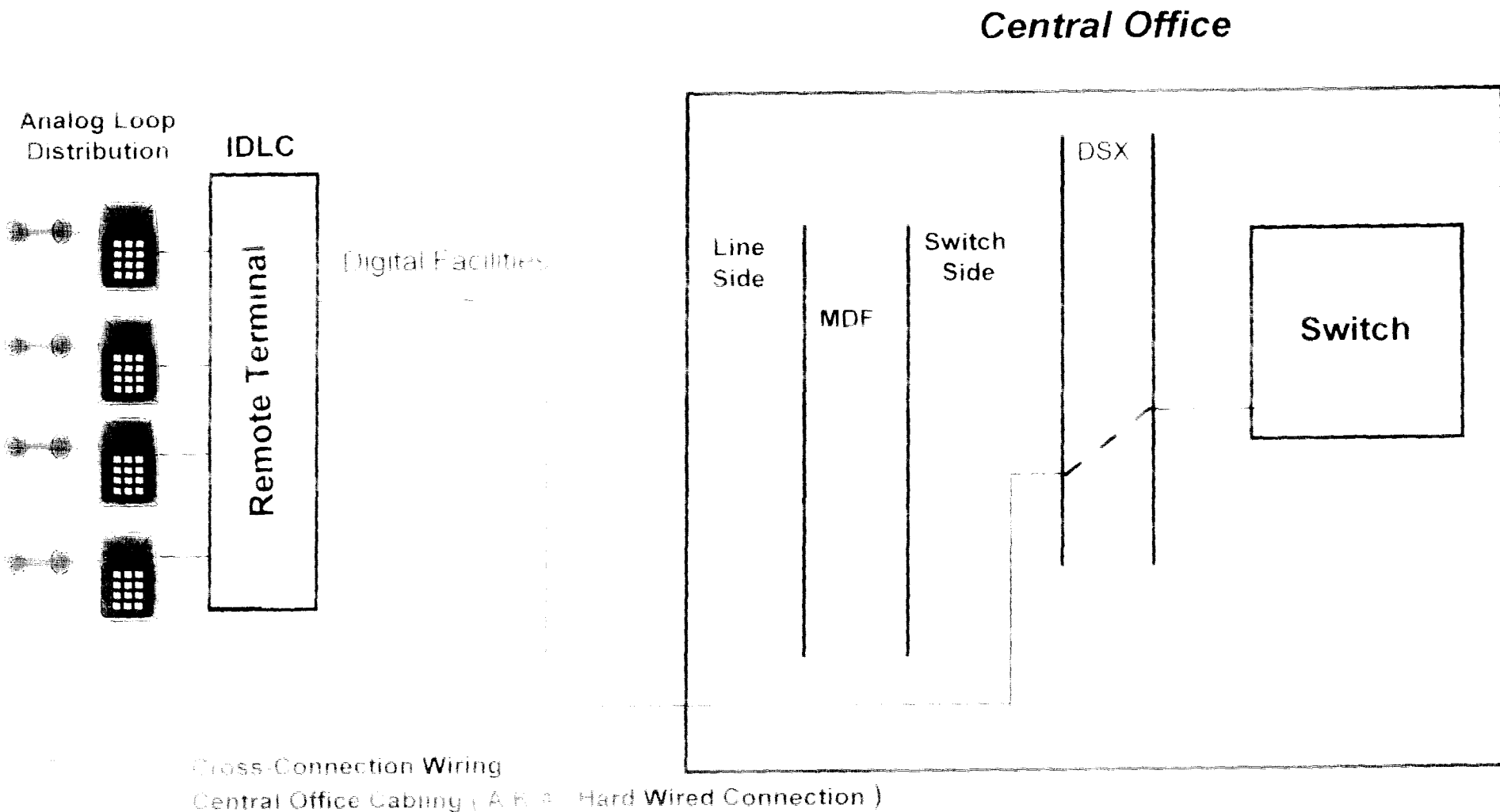
Figure 2
ILEC Loop And Switch Port Configuration
(With IDF)



ATTACHMENT 10

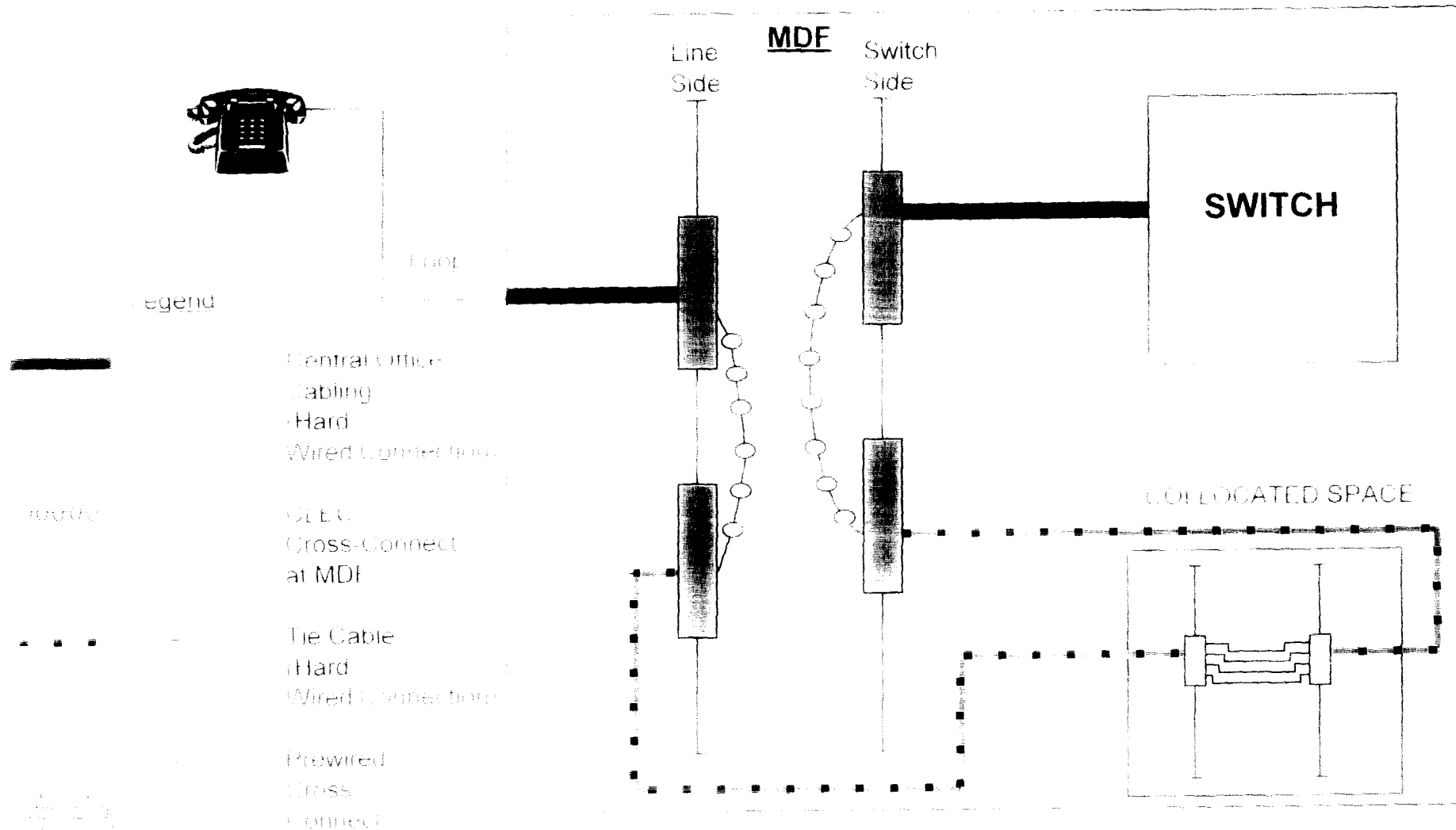
Figure 3:

Typical IDLC Loop And Switch Port Configuration



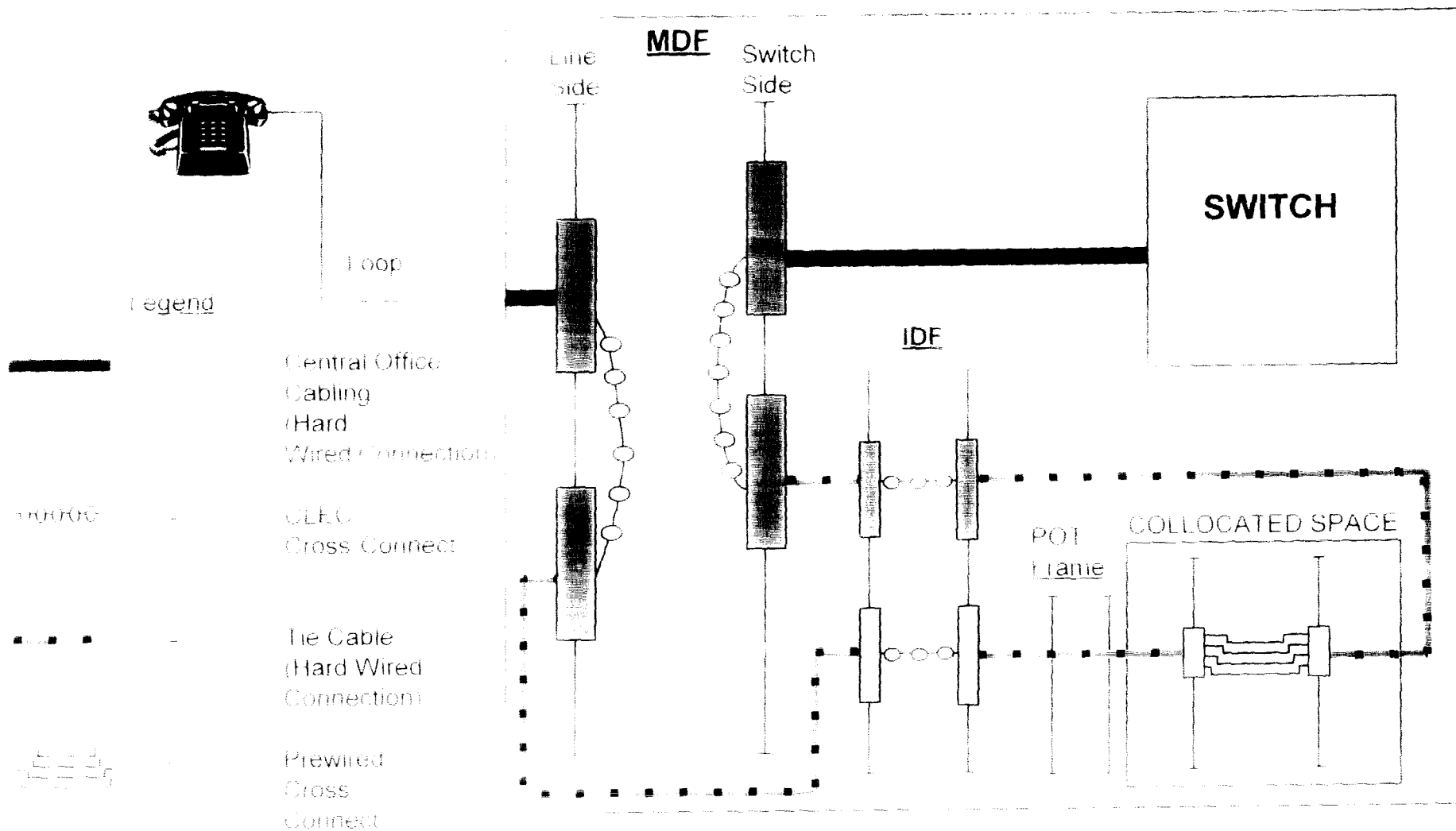
ATTACHMENT 11

Figure 4
Basic Collocation Arrangements
For Reconfiguring Network Elements



ATTACHMENT 12

Figure 5
Collocation Configuration For Combining Elements
Where IDF And POT Frames Are Used



ATTACHMENT 13

BellSouth Interconnection Services
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1960 West Exchange Place
Tucker, Georgia 30084

770 492-7360
Fax 770 521-0529

Quinton E. Sanders
Sales - Assistant Vice President
AT&T Regional Account Team

February 10, 1998

William J. Carroll
Vice President
AT&T Communications, Inc.
Room 4170
1200 Peachtree Street, NE
Atlanta, Georgia 30309

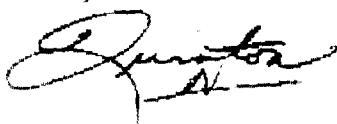
Dear Jim,

In response to your January 6, 1998 letter to Duane Ackerman, attached are BellSouth's responses to AT&T's 35 questions regarding combining unbundled network elements and collocation issues.

BellSouth continues to honor its contractual obligations with respect to the provisioning of combinations of UNEs identified by AT&T until such time as the Eighth Circuit's order becomes final and non-appealable. However, as BellSouth has stated before, if the Eighth Circuit's order is upheld, BellSouth will no longer have a legal obligation to provide combinations of unbundled network elements. BellSouth is still interested in exploring with AT&T the opportunity of a professional service arrangement in which BellSouth would combine UNEs for AT&T at market rate. Please contact me if AT&T is interested in pursuing such an arrangement.

The responses attached hereto provide the information that AT&T has requested. Should AT&T require any additional information, please address such request to me as your primary interface and contact. I will ensure that your request is handled accordingly. As your Account Team representative, I can assure you that adequate resources are available to AT&T via my staff and that such requests will be handled in an expeditious manner to meet AT&T's needs.

Sincerely,



cc: Duane Ackerman
Charlie Coe
Scott Schaefer
Elton King
Joe Baker
Scott Schaefer
Steve Inman
Alabama Public Service Commission
Florida Public Service Commission
Georgia Public Service Commission
Kentucky Public Service Commission
Louisiana Public Service Commission
Mississippi Public Service Commission
North Carolina Utilities Commission
South Carolina Public Service Commission
Tennessee Regulatory Authority

Attachment to February 10, 1998 Letter from Quinton Sanders

AT&T Questions Regarding BellSouth's Collocation Proposal Alternative Arrangements for CLEC Combination of UNEs

1. What UNEs will BellSouth provide to CLECs to combine in collocated space? Loops and ports only?

With the exception of specific sub-loop elements that will be provided to the CLEC at the field site, BellSouth will deliver to the CLEC collocation space the following combined elements: loop and cross connect, port and cross connect, port and cross connect and common transport, port and vertical features, port and common transport, loop and LNP¹, as well as single network elements, for the purpose of CLECs combining said elements in any manner technically feasible and that performs within the parameters of the industry standards.

2. Can a CLEC pre-wire the equipment in its collocation space?

In both a physical and virtual collocation arrangement, AT&T may pre-wire its equipment arrangement and the connection between its arrangement and the point of termination bay/frame using a vendor that has been certified by BellSouth.

3. Will BellSouth allow CLECs to share the same interoffice transport used by BellSouth?

Yes. CLECs may access unbundled interoffice transport - shared for interoffice transport purposes. Unbundled interoffice transport - shared allows access to the interoffice transport and is charged on a per minute of use basis. The CLEC would order the unbundled port in the central office where the collocation space is present which would allow the end user traffic to be transported over shared facilities.

Unbundled Interoffice Transport Dedicated may share the same physical facilities, fiber optic terminals, etc. An individual DS1 may be dedicated to a single CLEC, but the OC48 Fiber Optic Transport System would have multiple DS1s transiting the system.

4. Will BellSouth require that a CLEC purchase signaling separate from switching?

Yes. As contained in the CLEC agreements and as a result of arbitration decisions in the various states, SS7 signaling is an individual unbundled network element and therefore is purchased separately from switching.

¹ The combined elements listed above are offered by BellSouth based upon the technical limitations that do not allow them to be offered separately.

5. What does BellSouth propose where there is not sufficient room to collocate in central office?

BellSouth has offered both physical and virtual collocation to AT&T. Where there is insufficient space on BellSouth's premises for physical collocation, virtual collocation can be provided.

BellSouth does not anticipate any difficulty fulfilling requests for virtual collocation arrangements. In the event a situation arises where a virtual collocation request cannot be accommodated, BellSouth will discuss service alternatives on a case by case basis. Timely and accurate forecasts from CLECs will assist BellSouth in meeting CLEC's physical or virtual collocation needs.

6. How will BellSouth allow for the combining of loops and ports in central offices where there is no room for physical collocation?

When there is insufficient space for physical collocation, BellSouth will offer virtual collocation. In a virtual collocation arrangement, the CLEC may then make arrangements for the combination of the UNEs.

7. Will BellSouth offer CLECs a choice of either physical or virtual collocation or will virtual collocation be made available by BellSouth only if there is no more space available for physical collocation?

BellSouth offers CLECs a choice of either physical or virtual collocation.

8. How will BellSouth provision other UNEs for combining or recombining by CLECs?

BellSouth will provision UNEs as described in the applicable ordering guidelines, interconnection agreement and technical references. CLECs will determine how to use the UNEs, i.e., whether to combine them with other BellSouth provided UNEs or to use them with the CLEC's own equipment.

9. How will BellSouth maintain service coordination of the loop and port connections for each CLEC customer service order?

BellSouth offers service coordination for the individual unbundled network elements, the type of coordination being dependent upon how the network element is ordered. Such coordination should minimize the effect of transferring the end user customer from one provider to the other. This activity contemplates cooperation and coordination between the work forces of the providers involved in the transfer.

10. How will BellSouth maintain service continuity or minimize service disruption for CLEC customers during the loop and line port cut-overs?

During the process of loop conversions from BellSouth to a CLEC, the customer loop is physically removed from the BellSouth switch and then reconnected to the CLEC switch. This step is necessary to effect the conversion and does not produce lengthy interruptions of end user service. There are several options available to CLECs to reduce and virtually eliminate outage time. A CLEC can reduce the outage period by electing to have BellSouth provide manual order conversion. BellSouth also offers CLECs the option to request a specific conversion time and will then make every effort to accommodate the request.

11. Because the additional loop length caused by collocation may require loop conditioning, who will be responsible for performing the conditioning - BellSouth or the CLEC?

There will be no significant increase to the loop length as a result of provisioning the loop to a collocation space. Typically, the loop and the associated cross-connect to the collocation space would not be any longer than the loop and the associated cabling to a BellSouth switch. BellSouth will make whatever adjustments are necessary to ensure that the unbundled loop types requested meet the appropriate performance characteristics. The CLEC would be responsible for making any adjustments between its collocation space and the CLEC switch. In addition, due to the fact that the loop is not connected to the BellSouth switch, the CLEC will be responsible for providing any switched-based conditioning.

12. When will BellSouth provide written methods and procedures documenting its proposed collocation process for combining UNEs.

There are no unique M&Ps for the delivery of unbundled network elements to a collocation arrangement for the purpose of the CLEC combining said elements. The M&Ps developed by BellSouth for the purpose of ordering and provisioning of unbundled network elements will apply. These M&Ps have been previously provided to AT&T.

13. How many loop and line port jumper connections can BellSouth complete in a single day per central office? How many teams of technicians and shifts would this involve?

BellSouth is committed to being the provider of choice and as such is committed to employing the appropriate forces to meet the demands of the CLECs. However, the number of connections that can be completed in a single day varies day to day and varies from C.O. to C.O. BellSouth is prepared to work orders by the due date. AT&T should refer large projects to the Account Team to assure project handling and dedicated central office personnel. In addition, AT&T should provide a service

forecast to the Account Team, which will assist BellSouth in anticipating load requirements.

14. Will BellSouth allow CLECs to obtain less than 100 square feet of collocation space solely for purposes of combining or recombining the necessary UNEs? If so, how will BellSouth reduce its existing charges for collocation space?

Physical collocation arrangements can be used for the provisioning of any telecommunications service including combining or recombining unbundled network elements. BellSouth will allow CLECs to obtain less than 100 square feet for Physical Collocation when an equipment arrangement enclosure is not utilized. Where an enclosure is requested, OSHA requirements dictate that at least 100 sq. ft. be utilized. Rates and charges for collocation space are set forth in the agreement and will be assessed based on the shadow print of the arrangement plus a factor which includes maintenance and wiring aisle space.

Rates, terms and conditions for Virtual Collocation are contained in BellSouth's FCC #1 tariff, Section 20.

15. Will BellSouth allow CLECs to combine UNEs without collocation?

BellSouth's policy is to deliver UNEs to a CLEC's collocation space for the purpose of combining unbundled network elements. AT&T has proposed several delivery methods in its January 6, 1998 letter. BellSouth is reviewing these methods.

16. Is BellSouth combining any components of its network or elements today via an electronic connection using a remote terminal? If so, which ones?

BellSouth uses a variety of network management systems to manage its network. AT&T and other CLECs have a variety of options available to them to manage their network management systems.

17. Will BellSouth permit CLECs to have direct access to the BellSouth main distribution frame (MDF)?

No. As the MDF was not designed for multiple users, such access will lead to an unacceptable higher risk of disruption of service to a large population of telecommunications users when technicians from a number of different telecommunications companies have access to the network and facilities of all telecommunications providing service to end users from that location. Further, BellSouth's inventory systems are not equipped to handle access to the MDF. The inventory systems are not equipped to track circuit paths through the central offices and thus, would not be able to provide accurate and timely information for provisioning maintenance and repair activities.

18. Will BellSouth provide CLECs access to its engineering records, as the records need to be updated to reflect the new loop length to ensure MLT testing works properly?

Metallic Loop Testing (MLT) does not rely on individual records to determine test parameters and, therefore, CLEC's do not need access to engineering records for such testing purposes.

19. How will maintenance of the combined unbundled elements work?

Unbundled network elements delivered to the CLEC's collocation space will be maintained by BellSouth in the same manner that such element was delivered to CLEC. In other words, each individual element can be tested to determine performance specifications.

20. Please describe all BellSouth methods and procedures to describe how it will separate already-combined elements and how CLECs will "recombine" these elements? If such methods and procedures do not yet exist, when will they be completed and made available to CLECs?

BellSouth recognizes that under the current agreements executed with AT&T, BellSouth may not disconnect those elements that are already combined. However, once the Eighth Circuit's decision becomes final and non-appealable, the combination provisions in the agreements will have to be revisited.

However, for purposes of answering this question, there are no unique M&Ps to provide unbundled network elements to AT&T for the purpose of AT&T combining these unbundled network elements. BellSouth offers order coordination for the purpose of transferring a BellSouth customer to an AT&T customer where AT&T intends to utilize unbundled network elements to provide service to that same customer.

21. What OSS impacts are anticipated from BellSouth's "collocation" proposal? What OSS will BellSouth access/utilize to separate already combined elements and to allow CLECs to "recombine" elements? How will BellSouth provide CLECs access to these OSS?

There are no OSS impacts due to BellSouth's collocation proposal. Collocation is ordered pursuant to Attachment 3 of the Interconnection Agreement. AT&T will utilize the OSSs set forth in Attachment 15 of the Interconnection Agreement to order individual network elements for the purpose of BellSouth delivering the unbundled network elements to AT&T's collocation space so AT&T can combine those unbundled network elements. Order coordination is available as set forth in BellSouth's response to number 20.

22. What impact does BellSouth's "collocation" proposal have on engineering and inventory records? What records will BellSouth access or modify to separate already connected elements? What records will need to be accessed and/or updated for a CLEC to complete recombination of UNEs? What is BellSouth's plan to accurately maintain such records? How will multiple CLECs using recombined UNEs be given access to BellSouth's engineering and inventory records?

The engineering and inventory records will be modified to reflect the delivery of the individual unbundled network elements to the collocation space, and will not be inventoried as services delivered to the end user.

BellSouth will have an inventory of the individual unbundled network elements delivered to the collocation space. BellSouth will not have any record of what the CLEC does with the individual unbundled network elements once they are delivered.

The CLEC will not require access to BellSouth's system for recombination of elements by the CLEC because the CLEC has assignment control at the collocation arrangement and can control where each unbundled element is delivered.

23. Has BellSouth investigated any alternatives to collocation for the recombination of network elements (for example, providing CLECs direct access to BellSouth's network equipment for physical recombining or logical separation and recombining)? If so, please describe these alternatives and explain BellSouth's reasons for not making these alternatives available to CLECs prior to this date? If not, when will any such investigation be done?

BellSouth has examined the offerings of various incumbent local exchange companies and has determined that, at present, collocation is the most appropriate arrangement for CLECs to combine unbundled network elements. AT&T proposed several alternatives to collocation in its January 6, 1998 letter to Duane Ackerman. BellSouth is investigating the feasibility of these alternatives.

24. How many customers will BellSouth be able to convert in each of its central offices per day when collocation is used to combine a loop and port?

See response to Issue 13

25. How many collocation arrangements can BellSouth accommodate per month per state?

BellSouth is committed to being the provider of choice and as such is continuing to improve its processes to become more efficient and expedient in fulfilling collocation requests.

Collocation arrangements shall be provisioned in accordance with Attachment 3 of the Interconnection Agreement. The number of arrangements that can be accommodated depends on the location, the number of requests, the work associated with each request and the commitment of both parties to jointly prioritize and plan implementation of the collocation arrangements requested.

A reasonable estimate of the locations and volume that AT&T is projecting would enhance BellSouth's ability to respond.

26. What is the availability of collocated space in each BellSouth central office? Please describe any limitations which may exist.

This question is overly broad in that there are approximately 1600 Central Offices in the BellSouth region (See NECA Tariff FCC No. 4 for a complete list of central offices). Responding to this question for each central office would require a colossal effort on BellSouth's part. However, to address your question, each request for collocation must be evaluated for space availability on an individual case basis. Availability is determined at the time a collocation application is submitted to BellSouth with the appropriate application fee.

27. Assuming a CLEC has pre-wired loop and switch connections in its collocation space to blocks on BellSouth MDF and/or IDF frames, what is the expected duration of customer down time for conversion of an existing BellSouth customer to a UNE CLEC customer?

The customer down time may vary depending upon whether coordination is required, the telephone number is ported, it is a designed or non-designed circuit and the type of frame in the central office.

28. How does BellSouth propose to remedy the provisioning/service parity issues associated with its collocation proposal e.g., (1) electronic provisioning vs. manual provisioning; (2) additional loop lengths and additional connections; (3) additional possible points of failure?

BellSouth is not aware of any provisioning/service parity issues associated with BellSouth's collocation proposal.

BellSouth does not electronically provision BellSouth customers on its own mainframe. This is a manual process requiring the use of BellSouth work forces to run jumpers.

BellSouth is not aware of any provisioning/service parity issue associated with BST's unbundled loop lengths. No additional loop lengths should be added on unbundled loops. The unbundled loop will be handed off to the CLEC at its

collocation space through a tie cable that replaces the tie cable that would normally route the loop to the switch. Additional connections may or may not be applicable on the BST side of the collocation space; however, the element delivered to the collocation space will perform in accordance with the industry standards and service performance parameters found in Attachment 2 of the Interconnection Agreement.

29. Will BellSouth allow a CLEC to collocate in a BellSouth remote switching site (location where it has a remote switching module)?

BellSouth will allow a CLEC to collocate on a BellSouth Premises (as "Premises" has been defined by the FCC's rules and regulations). BellSouth's position regarding collocation is the same regardless of the type of switching system used at a given central office.

30. Will BellSouth require AT&T to execute a "Master Collocation Agreement" or other agreement(s) before BellSouth will make collocation available to AT&T? If so, please provide a copy of this agreement(s). Are there any modifications needed to AT&T Interconnection Agreement(s) with BellSouth in any states before BellSouth will make collocation available to AT&T? If so, what are they?

AT&T will not be required to execute a "Master Collocation Agreement", as collocation is already incorporated into the AT&T Interconnection Agreements with BellSouth. BellSouth believes that no additional modifications are required to the existing collocation section of the Interconnection Agreement. If AT&T's opinion differs, BellSouth will be glad to discuss this issue.

31. What intervals will BellSouth commit to as to the provision of requests for collocation?

Request for collocation will be provisioned in accordance with Attachment 3, Section 2.2.18 of the Interconnection Agreement.

32. Has BellSouth tested, deployed facilities and/or personnel to assure itself that these intervals can be met? What remedies, if any, does BellSouth propose for CLECs if these intervals are not met?

BellSouth has negotiated interval dates with the CLECs and has been meeting those dates. BellSouth requests that CLECs provide all information required on the application to design the collocation space and obtain a building permit. BellSouth will stay in constant communication with the CLEC. If there is any problem with meeting the negotiated dates, BellSouth will notify the CLEC.

Pursuant to the AT&T/BellSouth Interconnection Agreement, BellSouth will reimburse AT&T in an amount equal to the AT&T expenditure incurred as a direct result of delays caused by BellSouth in the negotiated completion and turnover dates.

33. What costs are associated with BellSouth's collocation proposal? Please itemize all individual costs. What information will BellSouth provide to establish that such costs are "just, reasonable and nondiscriminatory?"

The costs associated with BellSouth's collocation proposal were provided in various proceedings throughout the BellSouth states. AT&T participated in all those proceedings. Collocation rates are contained in the interconnection agreement entered into between BellSouth and AT&T.

34. Does BellSouth have any actual commercial usage data from any of its states using physical collocation arrangements for purposes of allowing CLECs to combine UNEs? In other words, what testing has been done?

No unique testing is needed for the delivery of UNEs to a CLEC's collocation space. BellSouth has accepted orders and successfully delivered unbundled network elements to collocator's space for the purpose of the CLEC providing telecommunication services to end user customers.

35. How will BellSouth provision individual loops that currently are provisioned using Integrated digital loop carriers for combining with local ports?

BellSouth will provision individual loops that currently are provisioned using integrated digital loop carriers for combining with local ports pursuant to Attachment 2, Section 3 of the Interconnection Agreement. Thus, BST will "roll" the loop from the IDLC onto a universal DLC or other alternate facility at no extra charge. If no alternate facility exists, BST will utilize its existing Special Construction Process to determine what additional costs would be required to provide an unbundled loop to that end-user's location. Once these loops are "un-integrated" they would be provisioned to the CLEC's collocation space to be combined with other elements as the CLEC chooses to combine them.

ATTACHMENT 14